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*Attorneys for Defendant*

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF NEVADA**

ADAM HOANG, individually, and KEVIN  
CHIONG, individually,

Plaintiffs,

vs.

ALLSTATE FIRE AND CASUALTY  
INSURANCE COMPANY; DOES I through X,  
inclusive; and ROE CORPORATIONS, inclusive,

Defendants.

CASE NO.: 2:23-cv-00045-JCM-BNW

**STIPULATION AND ORDER TO  
CONTINUE DISCOVERY DEADLINE**

**(FIRST REQUEST)**

**IT IS HEREBY STIPULATED**, by and between Defendant ALLSTATE FIRE AND CASUALTY INSURANCE COMPANY, by and through its attorney of record, Christopher M. Keller, Esq. of the law firm of HAWKINS MELENDREZ, P.C.; and Plaintiffs ADAM HOANG and KEVIN CHIONG by and through their attorney of record Brandon A. Born, Esq. of THE702FIRM Injury Attorneys, and pursuant to LR IA 6-1, LR 7-1, and LR 26-4, hereby stipulate and agree to continue the discovery cut-off date set forth in the Order dated February 21, 2023 [ECF No. 9], Thirty (30) days.

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## **A. DISCOVERY COMPLETED TO DATE**

- The parties have provided witness lists and documents pursuant to Rule 26 (a)(1);
- The parties have provided expert disclosures;
- Defendant has propounded Interrogatories and Request for Production;
- Defendant has noticed the depositions of the Plaintiffs, but those depositions were cancelled because of the Plaintiffs' schedules and cannot be reset during the current discovery period; and
- Defendant has been attempting to set the depositions of medical providers for more than 45 days, but no dates have been secured and the depositions cannot take place during the current discovery period.

## **B. DISCOVERY THAT REMAINS TO BE COMPLETED**

- Depositions of Plaintiffs; and
- Deposition of Plaintiffs' treating physicians.

## **C. GOOD CAUSE EXISTS TO EXTEND THE DISCOVERY DEADLINES**

The parties have been participating in discovery, including scheduling Plaintiffs' depositions and depositions of Plaintiffs' treating physician. Plaintiffs' attorney has recently requested for Plaintiffs' depositions to be rescheduled, which will need to take place after close of discovery. This has resulted in a delay which the parties wish to remedy by providing an additional (30) days for depositions to be scheduled. As it currently stands, with the incomplete depositions and responses to written discovery, the parties are not in a position to proceed with trial.

Based on the foregoing, the parties respectfully request that the Court grant their joint request to extend the discovery deadlines for thirty (30) days.

## **D. PROPOSED DISCOVERY SCHEDULE**

The Parties agree that an additional thirty (30) days is sufficient time to complete discovery, and that the new deadlines should begin to run from the existing deadlines.

### **The current discovery deadlines are as follows:**

1. Amend Pleadings / add parties: April 13, 2023

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2. Initial experts: May 12, 2023
3. Rebuttal experts: June 10, 2023
4. Discovery cut-off: July 12, 2023
5. Dispositive motion: August 11, 2023
6. Joint proposed pretrial order: September 10, 2023

**The proposed discovery deadlines are as follows:**

1. Amend Pleadings / add parties: Closed
2. Initial experts: Closed
3. Rebuttal experts: Closed
4. Discovery cut-off: August 11, 2023
5. Dispositive motion: September 11, 2023
6. Joint proposed pretrial order: October 11, 2023

WHEREFORE, the parties respectfully request that the Court enter into an Order extending the discovery deadlines in accordance with the foregoing.

DATED this 6<sup>th</sup> day of July 2023.

**HAWKINS MELENDREZ, P.C.**

/s/ Martin I. Melendrez  
MARTIN I. MELENDREZ, ESQ.  
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DATED this 6<sup>th</sup> day of July 2023.

**THE702FIRM**

/s/ Brandon A. Born  
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Las Vegas, NV 89101  
*Attorneys for Plaintiffs*

**ORDER**

IT IS SO ORDERED the deadlines are set as follow:

- Amend Pleadings / add parties: Closed
- Initial experts: Closed

- Rebuttal experts: Closed
- Discovery cut-off: August 11, 2023
- Dispositive motion: September 11, 2023
- Joint proposed pretrial order: October 11, 2023

**ORDER**

**IT IS SO ORDERED**

**DATED:** 9:51 am, July 07, 2023



**BRENDA WEKSLER**  
**UNITED STATES MAGISTRATE JUDGE**

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